

HON. SYLVIA O. HINDS-RADIX Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

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April 10, 2024

**BY ECF** 

Hon. Lorna G. Schofield Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: E.K. et al. v. New York City Dep't of Education, 23-cv-11276 (LGS)

Your Honor:

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent Defendants in the above-referenced action. The Parties write jointly to request that the Court grant a stay of the Parties' briefing schedules for sixty (60) days. The reason for this request is to allow the parties time to discuss whether there is a possibility of a resolution of the case through a negotiated settlement. This is the Parties' first request for an extension of our briefing schedule. If granted, the Parties' briefing schedule would be as follows:

June 7, 2024: Defendants' Motion for Summary Judgment

June 30, 2024: Plaintiffs' Opposition and Cross-motion for Summary Judgment

July 21, 2024: Defendants' Reply and Response to Cross-Motion

August 5, 2024: Plaintiffs' Reply

Thank you for your consideration.

Respectfully,

/s/ Jason Imbiano

Jason Imbiano

**Assistant Corporation Counsel** 

Application **GRANTED.** If the parties proceed with cross-motions for summary judgment, they shall comply with the briefing schedule proposed above. The parties' briefing shall otherwise comply with the Order at Dkt. No. 8. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 11.

Dated: April 11, 2024

New York, New York